

**Fermilab Suspect / Counterfeit Item
Assessment Report**

**Office of Quality and Best Practices
Fermi National Accelerator Laboratory
Batavia, IL
May, 2011**

Approved By: _____



**John Robert Grant
Head, Office of Quality and Best Practices
Fermi Research Alliance, LLC**

1.0 Background

To determine Fermilab's level of compliance with the Integrated Quality Assurance (IQA) requirements, the Office of Quality and Best Practices (OQBP) is performing a series of assessments of the implementation and effectiveness of QA controls in each Division, Section and Center (D/S/C). This document provides a lab-wide summary and conclusions for Suspect/Counterfeit Item (S/CI) requirements distilled from individual D/S/C reports.

S/CI assessments were conducted between October 2010 and March 2011 by interview, observation of work and examination of work products, documents and records including ITNAs. Stockrooms and samples of items were examined for potential S/CI in four of eight D/S/Cs. Assessment teams interviewed requisitioners, Procard holders, receiving, inspecting and testing employees and all S/CI coordinators.

2.0 Results & Conclusions

Suspect/Counterfeit Items (S/CI) requirements found in IQA Chapter 10 and Controlling Suspect/Counterfeit Items Procedure, 1006.1001 have been implemented in two of eight D/S/Cs assessed; Business Services Section (BSS) and Technical Division (TD). However in both cases, because no S/CI have been discovered since the Controlling Suspect/Counterfeit Items Procedure 1006.1001 became effective on 3/19/10, the assessment team was not able to fully verify compliance.

S/CI requirements have not been effectively implemented within the remaining six D/S/Cs assessed.

- Four of eight S/CI Coordinators interviewed were not aware of their responsibilities for S/CI isolation, logging, investigation, status determination, or reporting
- One organization had no S/CI coordinator assigned.
- Employees discarded potential S/CI without S/CI investigation or segregated and tagged potential S/CI but failed to notify the S/CI Coordinator
- Individuals interviewed indicated that they purchase from reputable organizations, manufacturers or authorized distributors which only partially satisfies S/CI requirements
- Employees were not aware of recent bulletins distributed to S/CI Coordinators by OQBP

S/CI training has not produced effective results.

- There is a general lack of awareness of specific Fermilab S/CI requirements
- Training requirements are not fully met for personnel interviewed that are involved in design, procurement, receipt, inspection, or installation of S/CI-sensitive materials. Approximately 80% had either no ITNA requirement for S/CI training or had not taken S/CI training.
- Personnel from five of eight D/S/Cs indicated that the ITNA question associated with S/CI training is not clear enough to determine exactly who it should apply to.

Corrective Action Plans (CAPs) were issued to AD, CD, ES&H, FESS, PPD, and WDRS for incomplete implementation of S/CI requirements. In addition OQBP has initiated a CAP to address S/CI program weaknesses by simplifying procedures, changing media, content, duration and test questions included in the training, clarifying S/CI related ITNA questions, clarifying course pre-requisites and communication of all these changes to S/CI Coordinators, QARs and employees.

3.0 Findings

Six findings of noncompliance with IQA requirements for Suspect/Counterfeit Items were identified. Seven CAPs were issued, six to address D/S/C findings and one to address S/CI program weakness:

- AD-20101203-01: Controlling Suspect/Counterfeit Items Procedure, 1006.1001 is not fully implemented.
- CD-20110307- 01 The requirements of IQA Chapter 10, Suspect and Counterfeit Items, Suspect/Counterfeit Item (S/CI) Program 1001 and Administrative Procedure, Controlling Suspect/Counterfeit Items Procedure 1006/1001 have not been fully and effectively implemented within the CD departments assessed.
- ESH-20110405-01: Requirements of the "Suspect/ Counterfeit Item (S/CI) Program", (Document 1006) and "Controlling Suspect/ Counterfeit Items Procedure" (Document 1006.1001) are not fully implemented
- FESS-20110127- 02 S/CI program is not adequately implemented in accordance with IQA Chapter 10 and QA 1006 S/CI Program requirements.
- PPD-20110320-1: Requirements of the Suspect/ Counterfeit Item (S/CI) Program", (Document 1006) and "Controlling Suspect/ Counterfeit Items Procedure (Document 1006.1001) are not fully implemented.
- WDRS-20101130-02 S/CI program is not adequately implemented in accordance with IQA Chapter 10 and QA 1006 S/CI Program requirements.
- OQ-20100216-01 Section 10.1 of the IQA states that "Fermilab provides training on S/CI processes and controls (including prevention, detection, and disposition of S/CIs)". It has been found through program feedback and assessment interviews that the training does not effectively convey the program requirements in a way that is easily and consistently understood by those receiving the training.

4.0 Observations & Recommendations

Observations and recommendations are written to address opportunities for improvement which are either outside the scope of the assessment or are isolated incidents. Three observations were reported for which three recommendations were made as follows:

- Two for no records of S/CI training for interviewees including 1 person responsible for specifying and ordering items with recommendations to evaluate who should be trained
- One for sole reliance on stockroom personnel for S/CI control with a recommendation to understand the limits of inspection & test by stockroom personnel

5.0 Commendable Practices

One commendable practice was noted as follows:

- Issuing DOE HSS Safety Bulletins that describe how to detect Suspect/Counterfeit Square D breakers when issuing these items from the stockroom to requestors